

## REMARKS

1. Applicant thanks the Examiner for her remarks and observations which have greatly assisted Applicant in responding.

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2. Claims 1-14, and 19-32 stand rejected under 35 U.S.C. § 112, 2<sup>nd</sup> ¶ for failing to particularly point out and distinctly claims the subject matter of the invention. More particularly, the expression "and/or" in the preambles of claims 1 and 19 is found to be indefinite. The offending expression has been deleted from the claims, having been replaced with a Markush group. Accordingly the rejection of the claims under 35 U.S.C. § 112, 2<sup>nd</sup> ¶ is deemed overcome.

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3. Claims 1-8, 14-15, 19-26 and 32-33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,829,613 ("Liddy") in view of U.S. Patent No. 6,006,221 ("Paik"). Applicant respectfully disagrees.

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Liddy describes a process for controlling distribution of information from a secure domain. Briefly, the process includes the steps of: creating semantic models for message categories, and individual messages; determining a degree of similarity between the semantic model of an outgoing message and the category models; classifying the outgoing message; and determining if the outgoing message can be distributed, based on the classification.

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On the other hand, the claimed invention has nothing to do with classification of messages, or controlling distribution of information from a secure domain. The claimed invention provides methods and apparatus for relating media to information in a workflow system, wherein the invention performs real-time analysis of incoming content and algorithmically matches information content to the analyzed content. Referrals to the related reference documents are sent to the appropriate application. The referrals are displayed to the user, and the user can select any of the related documents and/or media for display. Thus, the invention disseminates reference information to a user that is related to the analyzed content.

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Applicant notes that the Examiner's interpretation of the claim language "informational documents" is inconsistent, perhaps confused. For example, the Examiner relies on col. 5, lines 46-56 and Fig. 3 of Liddy as teaching or suggesting "providing a set of informational documents." Fig. 3 of Liddy shows a flowchart of a process for controlling distribution of information. Applicant sees no teaching whatsoever of "providing informational documents." The corresponding teachings from the specification add nothing to Fig. 3. The Examiner may say that the creation of semantic models constitutes "providing informational documents." Applicant points out that the semantic models are not "informational" . . . they are not intended to disseminate information to anyone. Rather, the ordinarily-skilled practitioner would understand the semantic model, as described in Liddy, to be a signature, or a fingerprint, used for analysis of the messages, rather than to disseminate information.

The Examiner next relies on col. 5, line 50 to col. 6, line 4, and Fig. 3 of Liddy as teaching or suggesting "wherein said informational documents comprise any of text, Web, and media documents." Applicant respectfully disagrees. As above, there is nothing in Fig. 3 to teach or suggest anything about "informational documents." Additionally, there is nothing in the cited text to teach or suggest informational documents that comprise text, web and media documents. The col. 5 text merely adds more detail to the description of the process depicted in Fig. 3. The col. 6 text describes construction of a semantic model for the outgoing message based on its contents.

The Examiner next relies on col. 6, line 15-26 and Fig. 4 of Liddy as teaching or suggesting "providing a pre-processed analysis of said informational documents." Fig. 4 describes construction of a semantic model for a message category. Above, it appeared that the Examiner was interpreting the semantic models of the messages and the message category to be "informational documents." Here, she appears to be interpreting the "informational documents" to be the message description itself. They can't be both.

The Examiner relies on Liddy, col. 6, lines 53-65 and Fig. 4 as teaching "wherein said analysis is an analysis of said informational documents for

semantic and conceptual use.” What is actually described is analysis of the message category description.

5 The Examiner relies on Liddy, col. 7, lines 5-20 as teaching or suggesting “identifying informational documents related to said analyzed content using said analysis.” Here, it appears that the Examiner has interpreted “informational documents” to be the documents that make up the corpus from which the semantic documents are described.

10 The Examiner relies on Liddy, col. 7, lines 20-38 “providing a user with a description of each identified informational document.” The “KNOW-IT” system is described as a knowledge extraction system, having the capability of performing a semantic and conceptual analysis of a text segment. There is absolutely no teaching or suggestion that the “KNOW-IT” system has the capability of providing a user with a description of an identified informational document.

15 The Examiner relies on Paik col. 8, lines 40-53 as teaching or suggesting “accepting user input for selecting an identified informational document.” However, what the cited teaching actually describes is a user interface for accepting queries, and has nothing to do with selecting identified documents.

20 The Examiner relies on Paik, col. 6, lines 43-47 as teaching or suggesting “displaying the selected informational document to the user.” What the cited text actually describes is presentation of query results to the user. There is no teaching or suggestion that actual documents are presented to the user.

25 Accordingly, the combination of Liddy and Paik fails to teach or suggest all elements of claim 1. Therefore, the present rejection of claim is deemed to be improper. Nevertheless, in the interest of advancing prosecution of the Application, Applicant amends the independent claims to describe the invention with greater specificity.

30 Within the context of the invention, the “informational documents” delivered to the user are references. That is, the system provides reference documents to the user that, based upon semantic analysis, are found to be related to the analyzed content. To describe the invention with greater specificity, Applicant amends the claims to replace all occurrences of the

expression "informational documents" with "reference documents" to explain more clearly what the "informational documents" are. Support for the amendment is found in Figure 1 of the application at reference number 105 and in the accompanying description. No new matter is added by way of the amendments.

Such amendment is not to be taken as Applicant's agreement with the Examiner's position. Rather it is made in the interest of advancing prosecution of the Application. Applicant expressly reserves the right to pursue patent application of a scope it believes it is entitled to in one or more continuing applications.

There is no teaching or suggestion in the combination of Liddy and Peik of:

- "analyzing said content in real time;  
wherein said analyzing step analyzes said content for semantic and conceptual use;
- providing a set of reference documents;  
wherein said reference documents comprise any of text, Web, and media documents;
- providing a pre-processed analysis of said reference documents;  
wherein said pre-processed analysis is an analysis of said reference documents for semantic and conceptual use;
- identifying reference documents related to said analyzed content using said pre-processed analysis;
- providing a user with a description of each identified reference document;
- accepting user input for selecting an identified reference document; and
- displaying the selected identified reference document to the user."

Accordingly, the rejection of claim 1 is deemed overcome. In view of their dependency from an allowable base claim, the dependents are deemed to be allowable without any separate consideration of their merits.

The above remarks apply equally to the remaining claims.

Claims 9-12 and 27-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Liddy in view of Peik and further in view of U.S. Patent No. 6,718,367 ("Ayyadurai"). In view of the above remarks, and the above amendments, the present rejection is deemed overcome.

Claims 13, 16-18, 31 and 34-36 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Liddy in view of Peik and further in view of U.S. Patent No. 6,816,858 ("Codan"). In view of the above remarks, and the above amendments, the present rejection is deemed overcome.

## CONCLUSION

In view of the foregoing, the Application is deemed to be in condition for allowance. Therefore, reconsideration and prompt allowance of the claims is respectfully requested. Should the Examiner find it helpful, she is urged to contact Applicant's attorney at 650-474-8400.

Respectfully submitted,

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